

1 NICHOLAS A. TRUTANICH

2 United States Attorney

3 District of Nevada

4 Nevada Bar No. 13644

5 HOLLY A. VANCE

6 Assistant United States Attorney

7 United States Attorney's Office

8 100 West Liberty Street, Suite 600

9 Reno, NV 89501

10 (775) 784-5438

11 Holly.A.Vance@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 MARY KIM PICCININI, and
16 GEORGE ELDRIDGE & SON, INC.,

17 Case No. 3:17-cv-00584-HDM-WGC

18 Plaintiffs,

19 **STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO MOTION TO
STRIKE (ECF NO. 55)**

20 v.

21 **(FIRST REQUEST)**

22 UNITED STATES OF AMERICA,

23 Defendant.

24 Defendant, United States of America, and Plaintiffs, Mary Kim Piccinini and George Eldridge & Son, Inc., hereby stipulate and agree that Defendant may have a 21-day extension to file its response to Plaintiffs' Motion to Strike Documents Produced with Defendant's Amended Third Supplemental Disclosure Statement. (ECF No. 55). Defendant's response is currently due on December 20, 2019. An extension is needed, however, because key agency representatives are out of the office due to the holidays and their input is needed in preparing and finalizing Defendant's response to Plaintiff's motion. Also, defense counsel was out of the office on

1 business and due to illness the week of December 9, 2019. An extension would give Defendant
2 up to and including January 10, 2020, in which to respond to Plaintiffs' motion.

3 Defense counsel contacted Plaintiffs' counsel via email and telephone, and Plaintiffs'
4 counsel, Tom Brennan, advised that he does not object to Defendant's extension request. This is
5 Defendant's first request for an extension of time. Defendant seeks this extension request in good
6 faith and not for the purpose of delay.

7 Dated: December 16, 2019.

8 NICHOLAS A. TRUTANICH
9 United States Attorney

ROSE LAW OFFICE

10 s/ Holly A. Vance
11 HOLLY A. VANCE
12 Assistant United States Attorney
13 Counsel for Defendant

s/ Sean P. Rose
14 SEAN P. ROSE
15 Counsel for Plaintiffs

DURNEY & BRENNAN LTD.

16 s/ Thomas R. Brennan
17 THOMAS R. BRENNAN
18 Counsel for Plaintiffs

19 **IT IS SO ORDERED.**

20 **DATED: December 17, 2019.**

21 
22 **HON. WILLIAM G. COBB**
23 **United States Magistrate Judge**